REMARKS

Applicants express appreciation to the Examiner for the courtesy of an interview granted to applicants' representative Marc A. Berger (Reg. No. 44,029). The interview was held by telephone on Monday, February 5, 2007.

Applicants have carefully studied the outstanding Office Action and the cited art. The present amendment is intended to place the application in condition for allowance and is believed to overcome all of the objections and rejections made by the Examiner. Favorable reconsideration and allowance of the application are respectfully requested.

Applicants have canceled claims **143** – **153** and **157** – **167**, amended claims **1**, **26**, **51**, **72**, **115**, **124**, **141**, **142** and **171** – **174,** and added new claims **176-187**. No new matter has been added. Claims **1** – **12**, **14** - **18**, **25** – **37**, **39** - **43**, **50** – **58**, **60** - **63**, **67** – **79**, **81** – **84**, **88** – **92**, **115** – **132**, **141**, **142**, **171** – **174, and 176** - **187** are presented for examination.

In reviewing the Office Action, applicants noted some points of confusion, as follows:

(i) In Paragraph II of the Office Action, on pages 3 and 4, the Examiner cites Howard and Ram in a 103(a) rejection, but proceeds to refer to Pomerantz and Saito? Moreover, in Paragraph V of the Office Action, the Examiner cites Pomerantz and Saito in a 103(a) rejection?

(ii) In Paragraph II of the Office Action, the Examiner has rejected claims **24** and **49**, but these claims were deleted in applicants' previous response?

(iii) In Paragraph V of the Office Action, the Examiner has rejected claims **115** – **132**, **141**, **142** and **174**, and proceeds to discuss claim **173**?

(iv) In Paragraph V of the Office Action, the Examiner cites Pomerantz and Saito, but refers to Ram on page 17 in rejecting claims **123** and **132**?

As indicated below, applicants have addressed the Examiner's rejections assuming that (i) the Examiner's intention was that Paragraphs II and V be combined into a 103(a) rejection of the claims listed in both of those paragraphs, based on Pomerantz and Saito; (ii) claims **24** and **49** should have been omitted from the list of rejected claims in Paragraph II; (iii) claim **173** should have been included in the list of rejected claims in Paragraph V; and (iv) Ram was not intended to be referenced in Paragraph V.

On page 3 of the Office Action, the Examiner has objected to claims **16**, **41** and **82** as being of improper dependent form. Applicants believe that these claims are in proper dependent form. Regarding claim **16**, independent claim **1** from which it depends includes two decrypting steps; namely, (1) decrypting encrypted text strings, corresponding to step **710** in **FIG. 7**; and (2) decrypting the portion of encrypted text, corresponding to step **540** in **FIG. 7**. Claim **16** limits (2) to a patched operating system function. Regarding claim **41**, independent claim **26** from which it depends includes two decoder elements; namely, (1) a string decoder corresponding to element **610** in **FIG. 6**, and (2) a text decoder corresponding to element **440** in **FIG. 6**. Claim **41** limits the text decoder. Claim **82** is similar to claim **41**.

In Paragraphs I and II of the Office Action, the Examiner has rejected claims **1** – **3**, **5** – **8**, **12**, **14** – **18**, **25** – **28**, **30** –

33, **37**, **39** – **43**, **50** – **53**, **55** – **58**, **60** – **63**, **67** – **74**, **76** – **79**, **81** – **84**, **90** – **92**, **171** and **172** under 35 U.S.C. §103(a) as being unpatentable over Pomerantz et al., U.S. Patent No. 6,178,243 ("Pomerantz") in view of Saito, U.S. Patent No. 5,900,005 ("Saito").

In Paragraph III of the Office Action, the Examiner has rejected claims **4**, **29**, **54** and **75** under 35 U.S.C. §103(a) as being unpatentable over Pomerantz in view of Saito, and further in view of the definition of XML.

In Paragraph IV of the Office Action, the Examiner has rejected claims **9** – **11** and **34** – **36** under 35 U.S.C. §103(a) as being unpatentable over Pomerantz in view of Saito and further in view of Bloomberg, U.S. Patent No. 5,761,686 ("Bloomberg").

In Paragraph V of the Office Action, the Examiner has rejected claims **115** – **132**, **141**, **142**, **173** and **174** under 35 U.S.C. §103(a) as being unpatentable over Pomerantz in view of Saito.

In Paragraph VI of the Office Action, the Examiner has rejected claims **143** – **153**, **157** – **167** and **175** under 35 U.S.C. §103(a) as being unpatentable over Lesk, U.S. Patent No. 5,905,505 ("Lesk") in view of Howard et al., U.S. Patent Application Publication 2001/0042045 ("Howard"). Applicants have canceled claims **143** – **153**, **157** – **167** and **175** without acquiescence to the Examiner's reasons for rejection and submit that rejection of these claims is thus rendered moot.

Distinctions between the claims and U.S. Patent No. 6,178,243 to Pomerantz et al. in view of U.S. Patent No. 5,900,005 to Saito

As to new method claim **176** and amended independent claim **186** for a computer-readable storage medium, applicant respectfully submits that the limitation in claim **176** and claim **186** of

"determining an output display formatting for the decrypted portion of the encrypted content, wherein the display formatting is based on at least one decrypted word in the decrypted portion",

is neither shown nor suggested in Pomerantz or Saito, taken individually or in combination.

Pomerantz does not determine an output display formatting based on a decrypted word. Referring to **FIGS. 6A – 6D** of Pomerantz and to their description at col. 7, line 64 – col. 8 line 20 of Pomerantz, the decrypted portion of the encrypted content is the text "This is a short example ...", but the output formatting is not based on the decrypted portion. Instead, the output formatting is based on control characters.

As mentioned hereinabove, Saito concerns translation and not encryption.

Because claims **177** - **184** depend from claim **176** and include additional features, applicants respectfully submit that claims **177** - **184** are not anticipated or rendered obvious by Pomerantz, Saito, or a combination of Pomerantz and Saito.

Accordingly claims **177** - **184** and **186** are deemed to be allowable.

As to new method claim **185**, applicants respectfully submit that the limitation in claim **185** of

"determining an output display formatting for a decrypted portion of the encrypted content by:

retrieving at least a portion of the encrypted content from the memory device;

decrypting the retrieved portion of the encrypted content; and

determining a size or length of a word in the decrypted portion",

is neither shown nor suggested in Pomerantz or Saito, taken individually or in combination.

Pomerantz does not determine an output display formatting by determining a size or length of a word in the decrypted portion. Referring again to **FIGS. 6A – 6D** of Pomerantz and to their description at col. 7, line 64 – col. 8 line 20 of Pomerantz, the decrypted portion of the encrypted content is the text "This is a short example ...", but the output formatting is not based on the size of length of one of these words.

As mentioned hereinabove, Saito does not determine spatial characteristics of decrypted words. The Microsoft API functions TextOut() and ExtTextOut() mentioned in Saito are used to write character strings and draw text.

Accordingly claim **185** is deemed to be allowable.

As to new system claim **187**, applicants respectfully submit that the limitation in claim **187** of

"*a formatter configured to determine an output display formatting for a decrypted portion of the encrypted content by:*

retrieving at least a portion of the encrypted content from the memory device;

decrypting the retrieved portion of the encrypted content; and

determining a size or length of a word in the decrypted portion",

is neither shown nor suggested in Pomerantz or Saito, taken individually or in combination. As indicated hereinabove with respect to claim **186**, Pomerantz does not determine an output display formatting by determining a size of length of a decrypted work, and Saito does not determine spatial characteristics of decrypted words.

Accordingly claim **187** is deemed to be allowable.

Distinctions between the claims and U.S. Patent No. 6,178,243 to Pomerantz et al. in view of U.S. Patent No. 5,900,005 to Saito and further in view of U.S. Patent No. 5,761,686 to Bloomberg

Pomerantz describes a document encryption method and system that enables a user to selectively encrypt portions of a document (Pomerantz / col. 6, line 41 – col. 7, line 54; **FIGS. 2B**, **3B**, **3C**, **4B** and **4C**). Pomerantz also describes recognizing and preserving layout control characters with the document, without encrypting them, in order that the encrypted document have the same overall layout as the non-encrypted document (Pomerantz / col. 6, line 55 – col. 8, line 20; **FIGS. 5A**, **5B** and **6A** – **6D**).

Saito describes a system for automatically extracting text displayed on a computer screen at the location of a cursor, and displaying a translation of the extracted text into another language on the computer screen. The translation is performed using an on-line dictionary application program (Saito / col. 4, lines 50 – 63; col. 5, **FIGS. 5** – **9** and the discussion thereof at col. 5, line 28 – col. 7, line 61). Saito operates by re-directing Windows API TextOut() functions to send their output to a text string extraction system, element **3** of **FIG. 1** (Saito / col. 4, lines 45 – 48; col. 5, lines 29 – 38; col. 6, lines 49 – 62).

Bloomberg describes a method for embedding information within an iconic version of a text image. The encoding method of Bloomberg is similar to that of a bar-code, in that it uses rectangular blocks of varying sizes, as indicated in **FIG. 10**, to represent data. The rectangular blocks are contained within an iconic image, such as the iconic image **20** of **FIG. 2**, used to represent an image of text, such as the text image **10** of **FIG. 1**. Bloomberg describes generating the iconic image so that it has the same characteristic layout appearance as the text image when rendered for display (Bloomberg / col. 4, lines 37 – 42; col. 5, lines 36 – 38; col. 11, line 66 – col. 12, line 5; col. 25, lines 7 - 13)

The specification describes a method and system for encrypting text within a web page, and for controlling the layout for display of the web page so that the web page is displayed for the text as it would be decrypted, instead of for the encrypted text contained within the web page. As such, (i) if the web page is saved or copied, the saved or copied page includes only encrypted text (**FIG. 1A**); yet (ii) if the web page is displayed by a web browser, the displayed page includes only decrypted text (**FIG. 1B**).

Thus a layout is generated for display of a source file, such as an HTML file, where the text to be displayed is different from the text in the source file. Specifically, the source file includes encrypted text, and the text to be displayed includes decrypted text. Intervention with the layout of the source file can be performed so that text is sized, spaced and positioned according to the decrypted text, and not according to the encrypted text within the source file. Effectively, as described at paragraph **[0075]** of the original specification, the layout is "fool[ed]"

"into believing that the encrypted text does indeed have the same character and word sizes as the original text, when in fact it does not."

A layout defines spatial characteristics, such as sizing, spacing and positioning, for display of text. The same text can be displayed in an infinite number of ways, and a layout defines spatial characteristics for one such way. Symbolically,

LAYOUT: TEXT → TEXT DISPLAY.

A layout is typically determined based inter alia on the size of a window in which the text is to be displayed. By varying the display text size when viewing a web page displayed by a browser, such as Microsoft's Internet Explorer (IE), one can see the effects of different layouts on the same text. (Within IE 7, for example, text size can be set to smallest / smaller / medium / larger / largest by activating "Text Size" under the menu list for "Page".) A good layout ensures that the displayed text fits in the window and has an aesthetic look.

The specification describes systems and methods for solving the problem that if a layout generated for encrypted text is then applied to decrypted text, the display is generally flawed. For example, the decrypted text may not fit in the window, or may wrap around itself, or may spill over objects such as images. Symbolically,

LAYOUT 1: ENCRYPTED TEXT → TEXT DISPLAY 1,

LAYOUT 1: DECRYPTED TEXT → TEXT DISPLAY 2;

and if LAYOUT 1 is generated based on ENCRYPTED TEXT, so that TEXT DISPLAY 1 is aesthetic, then in general TEXT DISPLAY 2 will be flawed. The specification describes intervening with system functions that generate LAYOUT 1, and instead generates a LAYOUT 2 with the property that

LAYOUT 2: DECRYPTED TEXT→ TEXT DISPLAY 1,

so that the text has an aesthetic display after being decrypted.

On page 5 of the Office Action, the Examiner has cited Saito as disclosing dynamically generating a display layout for a page. As indicated above, a layout for a page defines how text is sized, spaced and positioned for output display. Neither Pomerantz nor Saito describe dynamically generating a layout for a page. Pomerantz concerns documents, such as Word documents, that have fixed layouts governed by layout control characters, as indicated in **FIGS. 6A – 6D** of Pomerantz and the discussion thereof at col. 7, line 64 – col. 8, line 20. Pomerantz does not generate these layout control characters. Instead, Pomerantz preserves pre-existing layout control characters. Saito displays a graphical overlay, such as the overlay indicated in **FIG. 10C** of Saito, on a display of text generated by a web browser. Specifically, as indicated at col. 2, lines 4 – 6 of Saito, Saito uses drawing means (element **32** of **FIG. 1**) to draw symbols within a rectangular area, referred to at col. 2, line 53 of Saito as "an invisible dot matrix". Saito draws his graphical overly on top of text that has already been laid out.

Moreover, the Microsoft API functions TextOut() and ExtTextOut() mentioned in Saito are used to write character strings and draw text, respectively, as described in Microsoft's Developer Network (MSDN) documentation at http://msdn.microsoft.com/library/. These functions do not return spatial characteristics. In distinction, the systems and methods of claims **25**, **50**, **70**, **91**, **123** and **132** use the API function GetTextExtent(), which returns spatial characteristics of a line of text.

In order to further clarify this distinction between the claims and the prior art, applicants have amended the independent claims so as (i) to replace the expression "display layout for the page" with the

amended expression -- layout for display of the page --; (ii) to include the definition of a page layout within the claim limitations; and (iii) to include the limitation of a patched operating system function that returns spatial characteristics of text.

The rejections of claims **1** – **12**, **14** - **18**, **25** – **37**, **39** - **43**, **50** – **58**, **60** - **63**, **67** – **79**, **81** – **84**, **88** – **92**, **115** – **132**, **141**, **142** and **171** -**174** in Paragraphs I - V of the Office Action will now be dealt with specifically.

As to amended independent method claim **1** and amended independent claim **171** for a computer-readable medium, applicant respectfully submits that the limitations in claim **1** and claim **171** of

"*dynamically generating a layout for display of the page based on spatial characteristics of decrypted text instead of spatial characteristics of the encrypted text, to ensure that the display of the page corresponds to the display of a page containing the designated portion of original text, wherein a layout for display of a page defines spatial characteristics of text, the characteristics including at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations …*", and

"*decrypting encrypted text strings within a patched operating system function that returns spatial characteristics of text*"

are neither shown nor suggested in Pomerantz, Saito or Bloomberg, taken individually or in combination.

Because claims **2** – **12**, **14** - **18** and **25** depend from claim **1** and include additional features, applicant respectfully submits that claims **2** – **12**, **14** - **18** and **25** are not anticipated or rendered obvious by Pomerantz, Saito, Bloomberg, or a combination of Pomerantz, Saito and Bloomberg.

Accordingly claims **1** – **12**, **14** – **18**, **25** and **171** are deemed to be allowable.

As to amended independent system claim **26**, applicant respectfully submits that the limitations in claim **26** of

"*a page formatter controlling a layout for display of the page, by dynamically generating a page layout based on spatial characteristics of decrypted text instead of spatial characteristics of the encrypted text, to ensure that the display of the page corresponds to the display of a page containing the designated portion of original text, wherein a layout for display of a page defines spatial characteristics of text, the characteristics including at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations …*", and

"*a string decoder for decrypting encrypted text strings, said string decoder operating within a patched operating system function that returns spatial characteristics of text*"

are neither shown nor suggested in Pomerantz, Saito or Bloomberg, taken individually or in combination.

Because claims **27** – **37**, **39** - **43** and **50** depend from claim **26** and include additional features, applicant respectfully submits

that claims **27** – **37**, **39** - **43** and **50** are not anticipated or rendered obvious by Pomerantz, Saito, Bloomberg, or a combination of Pomerantz, Saito and Bloomberg.

Accordingly claims **26** – **37**, **39** - **43** and **50** are deemed to be allowable.

As to amended independent method claim **51** and amended independent claim **172** for a computer-readable medium, applicant respectfully submits that the limitation in claim **51** and claim **172** of

"*intervening with at least one function that controls layouts for display of the page, comprising dynamically generating a layout for display of the page based on spatial characteristics of decrypted text instead of spatial characteristics of the encrypted text, to ensure that the display of the page corresponds to the display of a page containing decrypted text, wherein a layout for display of a page defines spatial characteristics of text, the characteristics including at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations*"

is neither shown nor suggested in Pomerantz or Saito, taken individually or in combination.

Because claims **52** – **58**, **60** - **63** and **67** - **71** depend from claim **51** and include additional features, applicant respectfully submits that claims **52** – **58**, **60** - **63** and **67** - **71** are not anticipated or rendered obvious by Pomerantz, Saito, or a combination of Pomerantz and Saito.

Accordingly claims **51** – **58**, **60** – **63**, **67** – **71** and **172** are deemed to be allowable.

As to amended independent system claim **72**, applicant respectfully submits that the limitation in claim **72** of

"a page formatter controlling a layout for display of the page, by dynamically generating a layout for display of the page based on spatial characteristics of decrypted text instead of spatial characteristics of encrypted text, to ensure that the display of the page corresponds to the display of a page containing decrypted text, wherein a layout for display of a page defines spatial characteristics of text, the characteristics including at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations"

is neither shown nor suggested in Pomerantz or Saito, taken individually or in combination.

Because claims **73** – **79**, **81** - **84** and **88** - **92** depend from claim **72** and include additional features, applicant respectfully submits that claims **73** – **79**, **81** - **84** and **88** - **92** are not anticipated or rendered obvious by Pomerantz, Saito, or a combination of Pomerantz and Saito.

Accordingly claims **72** – **79**, **81** - **84** and **88** - **92** are deemed to be allowable.

As to amended independent method claim **115** and amended independent claim **173** for a computer-readable medium,

applicant respectfully submits that the limitation in claim **115** and claim **173** of

"*dynamically formatting a page containing a first portion of text to determine a layout for display of the page, comprising intervening with at least one function that controls layouts for display of the page, to base the layout for display of the page on spatial characteristics of a second portion of text instead of spatial characteristics of a first portion of text, to ensure that the display of the page corresponds to the display of a page containing the second portion of text, wherein a layout for display of a page defines spatial characteristics of text, the characteristics including at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations*"

is neither shown nor suggested in Pomerantz or Saito, taken individually or in combination.

Because claims **116** – **123** depend from claim **115** and include additional features, applicant respectfully submits that claims **116** – **123** are not anticipated or rendered obvious by Pomerantz, Saito, or a combination of Pomerantz and Saito.

Accordingly claims **115** – **123** and **173** are deemed to be allowable.

As to amended independent system claim **124**, applicant respectfully submits that the limitation in claim **124** of

"*a page formatter dynamically formatting a page containing a first portion of text to determine a layout for display of the*

page, but based on spatial characteristics of a second portion of text instead of spatial characteristics of a first portion of text, to ensure that the display of the page corresponds to the display of a page containing the second portion of text, wherein a layout for display of a page defines spatial characteristics of text, the characteristics including at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations"

is neither shown nor suggested in Pomerantz or Saito, taken individually or in combination.

Because claims **125** - **132** depend from claim **124** and include additional features, applicant respectfully submits that claims **125** - **132** are not anticipated or rendered obvious by Pomerantz, Saito, or a combination of Pomerantz and Saito.

Accordingly claims **124** - **132** are deemed to be allowable.

As to amended independent method claim **141** and independent claim **174** for a computer-readable medium, applicant respectfully submits that the limitation in claim **141** and claim **174** of

"replacing first text strings with second text strings within a patched operating system function that dynamically generates a layout for display of a page"

is neither shown nor suggested in Pomerantz or Saito, taken individually or in combination.

In rejecting claims **141** and **174**, the Examiner has cited Pomerantz as teaching replacing first text strings with second text

strings when formatting a page to determine a page layout. As explained hereinabove, applicants respectfully submit that Pomerantz does not describe determining a page layout.

Accordingly claims **141** and **174** are deemed to be allowable.

As to amended independent system claim **142**, applicant respectfully submits that the limitation in claim **142** of

"a string processor replacing first text strings with second text strings, said string processor operating within a patched operating system function that dynamically generates a layout for display of a page"

is neither shown nor suggested in Pomerantz or Saito, taken individually or in combination.

Accordingly claim **142** is deemed to be allowable.

Support for Amended and New Claims in Original Specification

Independent claims **1**, **26**, **51**, **72**, **115** and **124** have been amended to include the limitation of a layout that defines spatial characteristics of text for display of a page. This limitation is described in the original specification at pars. **[0051]** and **[0067]** – **[0072]**.

New independent claims **176** and **186** include the limitation of determining output display formatting based on at least one decrypted word in a decrypted portion of content. This limitation is described in the original specification at elements **240**, **280** and **610** of **FIGS. 6** and the descriptions thereof at par. **[0081]**, elements **340** and **710** of **FIG. 7**, and the descriptions thereof at **[0082]**, and at original claims **23**, **48**, **68** and **89**.

New independent claims **176**, **185**, **186**, and **187** include the limitation of the memory device storing encrypted content while the decrypted content is displayed. This limitation is described in the original specification at pars. **[0016]**, **[0042]**, **[0058]**, **[0061]** and **[0087]**.

New dependent claim **177**, new independent claim **185** and new independent claim **187** include the limitation of determining a size or length of a word in the decrypted portion. New dependent claims **178** and **179** include the limitation of number of pixels and number of characters in a decrypted word. New dependent claim **181** includes the limitation of a string size module. These limitations are described in the original specification at pars. **[0068]** – **[0080]**, and at original claims **22**, **47**, **67** and **88**.

New dependent claim **180** includes the limitation of receiving encrypted content from an Internet source. This limitation is illustrated in **FIGS. 4** - **7** of the original specification.

New dependent claims **182** and **183** include the limitation of invocation of a view source command resulting in display of encrypted content. This limitation is illustrated in the original specification at **FIGS. 1C** and described at pars. **[0011]**, **[0046]** and **[0087]**.

For the foregoing reasons, applicants respectfully submit that the applicable objections and rejections have been overcome and that the claims are in condition for allowance.

In the event that the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants

petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees in connection with the filing of this document to Deposit Account No. 50-0665 referencing docket no. 606448016US01.

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